

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

SHILLING, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, et al.,

Defendants.

Case No. 2:25-cv-241

**SUPPLEMENTAL DECLARATION
OF VIDEL LEINS**

I, Videl Leins, declare as follows:

1. I write this declaration to supplement the declaration I signed on February 15, 2025, and submitted in support of the Motion for Preliminary Injunction in this matter on February 19, 2025. See ECF No. 31-28.

2. On March 12, 2025, I was placed on involuntary administrative absence by my command (Exh. A) who informed me that my Exception to Policy (FTP) memos have been rescinded and that I am required to attend the Transition Assistance Program (TAP) course, which is designed to prepare service members for civilian life.

3. I am currently eligible to test for promotion on March 20, 2025 but in order to take the Weighted Airman Promotion System (WAPs) test, I am required to dress in uniform. Service members placed on administrative absence are not allowed to wear uniform, so I am

1 uncertain if I will be able to test as planned.

2 4. Being placed on administrative absence has significantly impacted my career
3 progression by stripping away crucial opportunities for professional growth and advancement.

4 5. As a result, I'm unable to submit my package for the Airman Leadership School
5 (ALS) instructor position, a role that would have strengthened my leadership experience and
6 broadened my career prospects.

7 6. I have also been removed from USAF Rapid Damage Repair (RDR) training, also
8 known as Rapid Airfield Damage Recovery (RADR) that I was scheduled to attend at the end of
9 this month. In recent years, this training has been a key priority, emphasizing the importance of
10 highly skilled Airmen who can effectively repair, restore, and secure airfields.

11 7. Additionally, the administrative absence has made me ineligible for award
12 packages that would have highlighted my contributions and set me apart among my peers.

13 8. Perhaps most damaging, it will have lasting effects on my Enlisted Performance
14 Brief (EPB), which directly influences my future promotion cycles.

15 9. Without these key accomplishments reflected in my records, my ability to
16 compete for advancement has been unfairly diminished.

17 10. I am required to comply with all standards applicable to service members
18 identified "M" gender marker in the Defense Enrollment Eligibility Reporting System (DEERS).
19 I have been on hormone replacement therapy (HRT) for nearly a year (11 months), and without
20 an Exception to Policy (ETP), I now have a sudden disadvantage in the requirement to meet male
21 fitness standards and am under undue stress because of the expectation to follow male grooming
22 standards.

23
24
25 I declare under the penalty of perjury that the foregoing is true and correct.

26
27 DATED: March 18, 2025

Videl Leins
Videl Leins (Mar 19, 2025 00:22 PDT)

Videl Leins

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DECLARATION OF VIDEL LEINS IN
SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY INJUNCTION - 2
[2:25-cv-00241-BHS]

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